

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

UNITED STATES OF AMERICA

v.

ROBERT R. DOGGART,

Defendant.

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Case No: 1:15-CR-39

Judge Collier

UNOPPOSED MOTION TO DECLARE CASE COMPLEX AND EXTENDED

COMES NOW, the Defendant, by and through counsel, pursuant to 18 U.S.C. § 3161(7)(B)(ii), who hereby moves this Court for an order finding and concluding that the above reference case is so unusual and complex that the speedy trial deadlines otherwise applicable under 18 U.S.C. § 3161, *et seq.*, are unreasonable. In support, the United States does not oppose this motion.

The parties would show unto this Court that the discovery in this case is vast. The discovery consists of audio recordings between the Defendant and a Confidential Source over the course of approximately thirty (30) days, audio recordings over approximately thirty (30) days of the Defendant discovered during a court authorized wiretap, search warrants, surveillance records, telephone records, computer records and written materials.

During the search of Mr. Doggart's home, the police seized his home computer which contained 800 GB's of information. Currently, the computer is still being reviewed by law enforcement agents and that information has not been provided to defense counsel. Counsel anticipates that the computer will contain emails, online media records and additional evidence relevant in this case.

There are over forty (40) hours of audio and video records as well as over 1300 pages of printed materials.

Further, the law enforcement investigation in this case involved several other individuals who all reside outside the State of Tennessee. These individuals reside in South Carolina, Illinois, Texas and California to name a few. Counsel needs additional time to investigate these other potential sources of information.

Both parties submit that the usual speedy trial deadlines are unreasonable. And both parties are requesting that all deadlines be continued including the motion, plea and trial deadlines.

Counsel needs adequate time to review the discovery materials that have been provided, obtain, review and analyze the information contained on Mr. Doggart's computer, and to investigate the other out-of-state individuals listed in discovery.

Respectfully Submitted,

DAVIS & HOSS, P.C.

s/Bryan H. Hoss

Bryan H. Hoss, TN BPR #021529

Janie Parks Varnell, TN BPR #031256

Attorneys for the Defendant

850 Fort Wood Street

Chattanooga, TN 37403

(423) 266-0605

(423) 266-0687 – Fax

bryan@davis-hoss.com

janie@davis-hoss.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Memorandum of Law was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

This the 17th day of August, 2015.

s/Bryan H. Hoss

Bryan H. Hoss